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7 *Marketing Group, Inc.*, Jeffrey Goldstein,
8 Kenneth Adamson and Phillip Huston

Hon. Fred Van Sickle

9 Klein, Zelman, Rothermel & Dichter, L.L.P.
10 By: Sean A. Moynihan
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14 Attorneys for Defendants *Impulse*
15 *Marketing Group, Inc.*, Jeffrey Goldstein,
16 Kenneth Adamson and Phillip Huston

17 IN THE UNITED STATES DISTRICT COURT
18 FOR THE EASTERN DISTRICT OF WASHINGTON
19 AT RICHLAND

20 James S. Gordon, Jr.,

21 Plaintiff,

22 v.
23 Impulse Marketing Group, Inc.,
24 Jeffrey Goldstein, Phillip Huston,
25 and Kenneth Adamson,
26 Defendants.

Case No.: CV-04-5125-FVS
DEFENDANT HUSTON'S
MOTION TO DISMISS THE FIRST
AMENDED COMPLAINT
PURSUANT TO FED. R. CIV. P.
12(b)(1), (2) AND (6) OR, IN THE
ALTERNATIVE, FOR A MORE
DEFINITE STATEMENT
PURSUANT TO FED. R. CIV. P. 12(e)

27 Impulse Marketing Group, Inc.,

28 Third-Party Plaintiff,

v.
Bonnie F. Gordon, Jamila Gordon,
James Gordon, III, and Jonathan
Gordon,
Defendant Phillip Huston ("Huston"), by and through his counsel, Klein,
Zelman, Rothermel & Dichter, L.L.P., now moves for dismissal of the First Amended
DEFENDANT HUSTON'S MOTION TO DISMISS OR,
IN THE ALTERNATIVE, FOR A MORE
DEFINITE STATEMENT - 1
00082059;1

Third-Party Defendants.

KLEIN, ZELMAN, ROTHERMEL & DICTHER, L.L.P.
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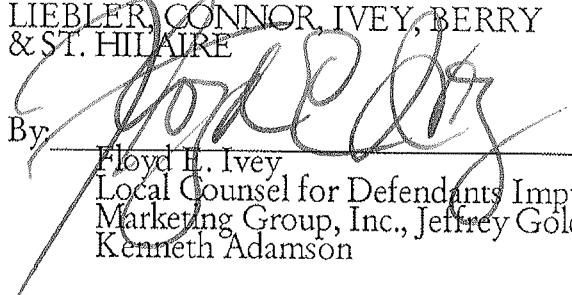
1 Complaint pursuant to Fed. R. Civ. P. 12(b)(1), (2) and (6) or, in the alternative, for a
2 more definite statement pursuant to Fed. R. Civ. P. 12(e). This motion is based upon
3 the Declarations of Sean A. Moynihan, Esq., and Phillip Huston in Support of
4 Defendant Huston's Motion to Dismiss Plaintiff's First Amended Complaint or, in the
5 Alternative, for a More Definite Statement and the Memorandum of Law in Support
6 of Defendant Huston's Motion to Dismiss Plaintiff's First Amended Complaint or, in
7 the Alternative, for a More Definite Statement.

8 DATED this 2nd day of January, 2007.

9
10 KLEIN, ZELMAN, ROTHERMEL
11 & DICHTER, L.L.P.
12

13 By: 
14 Sean A. Moynihan, admitted *pro hac vice*
15 Attorneys for Defendants Impulse Marketing
16 Group, Inc., Jeffrey Goldstein and Kenneth
17 Adamson

18 LIEBLER, CONNOR, IVEY, BERRY
19 & ST. HILAIRE
20

21 By: 
22 Floyd E. Ivey
23 Local Counsel for Defendants Impulse
24 Marketing Group, Inc., Jeffrey Goldstein and
25 Kenneth Adamson

26
27 DEFENDANT HUSTON'S MOTION TO DISMISS OR,
28 IN THE ALTERNATIVE, FOR A MORE
DEFINITE STATEMENT - 2
00082059;1

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